

EPA Comments on Willow Master Plan
June 6, 2022

EPA reviewed the materials on the Willow Creek Master Plan SEIS, focusing on the sections that are relevant to the social cost of greenhouse gases (SC-GHG).

In their appendix “SCC Writeup for all alternatives.docx,” (hereafter SCC Writeup) BLM calculates the SC-GHG for each project, separating it into several different categories. The addition of foreign emissions is an improvement to this draft, as well as the use of the interim SC-GHG figures following the lifting of the stay from the US District Court for the Western District of Louisiana. However, there are some concerns with this approach, particularly in terms of its replicability and transparency. With several notable sections missing and our concerns with transparency and replicability, it is not possible to affirm policy decisions based on the current state of the analysis.

1. The “SCC Writeup” contains two tables with monetized impacts across the different alternatives. Each is separated into direct and indirect emissions, foreign emissions, and “energy sources displaced by project.” We were not able to replicate the full dollar values presented in Tables 3.2.7 and 3.2.8 using information in the SEIS.
 - The SEIS does not present data on the individual GHGs across years. We were able to find annual average figures in Appendix E.2A for the gross emissions of each alternative. Additionally, Tables 3.2.2, 3.2.3, and 3.2.4 in the main Pre-Draft Supplemental Environmental Impact Statement contain the gross and net CO₂ equivalent (CO₂e) totals over the life of the project. However, it is not possible to obtain the values from the “SCC Writeup” using those figures. It is possible to get close to the indirect and direct values. However, the foreign and displaced values could not be replicated.
 - Section 3.2.2.2 states “The BLM EnergySub Report (Appendix E.2B, The BLM Energy Substitution Model) presents an estimate of the amount of Project crude oil production that would be substituted by replacement (“displaced substitute”) energy sources in the No Action Alternative.” That is not in Appendix E.2B.
 - EPA recommends including information and data regarding the displaced emissions estimates, as well as the foreign estimates. While Appendix E.2B contains an explanation of the methodology used in the energy modelling, it does not contain anything about the outputs of that exercise. Without this missing information, it is difficult to verify the accuracy of BLM’s estimates and inform decisions about the project.
 - To improve overall transparency and replicability, we recommend presenting a more accurate time path of emissions for each GHG. More details about assumptions are needed, as well as the individual GHGs from energy sources displaced by the project. Clarity about the assumptions on NPV calculations would also help.
2. EPA recommends disclosing any increasing conflict between GHG emissions and national, state, and local GHG reduction policies and goals, and whether there are ways to address that conflict in projects that expand and lock-in fossil fuel dependent infrastructure.
3. EPA recommends these edits to the text to clarify that the interim report provided updated SC-GHG estimates (with respect to ongoing litigation):

Section 5 of E.O. 13990 emphasizes how important it is for federal agencies to “capture the full costs of greenhouse gas emissions as accurately as possible, including by taking global damages into account” and established an Interagency Working Group (IWG) on SC-GHG. In February of 2021, the IWG published Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide: Interim Estimates under Executive Order 13990 (IWG 2021). This is an interim report that updated previous guidance-SC-GHG estimates from 2016. The final report is expected in 2022.

On February 11, 2022, the U.S. District Court for the Western District of Louisiana issued an order that, in general, enjoined the Department of Interior, among other agencies, from taking action in connection with Section 5 of Executive Order 13990, including using the interim SC-GHG estimates or other work product of -and the “IWG,” established by that Order relating to the measurement of SC-GHG. On March 16, 2022, the Fifth Circuit Court of Appeals stayed the injunction pending appeal (*Louisiana by & through Landry v. Biden*, No. 22-30087, 2022 WL 866282 [5th Cir. Mar. 16, 2022]), and this SEIS is including an analysis of the social cost of carbon pursuant to Executive Order 13990.

In accordance with this direction, this subsection provides estimates of the monetary value of changes in GHG emissions that could result from selecting each alternative. Such analysis should not be construed to mean a cost determination is necessary to address potential impacts of GHGs associated with specific alternatives. These numbers were monetized; however, they do not constitute a complete cost-benefit analysis, nor do the SC-GHG numbers present a direct comparison with other impacts analyzed in this document. SC-GHG is provided only as a useful measure of the benefits of GHG emissions reductions to inform agency decision-making.